## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Higinio Mora Debtor,

Midwest Loan Services as servicer for FIRST HERITAGE FINANCIAL LLC Movant.

v.

Higinio Mora

Debtor/Respondent,

Scott Waterman, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER 23-11529-pmm

CHAPTER 13

## ENTRY OF APPEARANCE AND REQUEST FOR NOTICE

Pursuant to Bankruptcy Rules 2002 and 9007, Bankruptcy Code §§102(1), 342, and 1109(b), FIRST HERITAGE FINANCIAL LLC, requests special notice of all matters which must be noticed to creditors, equity security holders, any creditors or other committees, and any other parties in interest whether sent by the Court, the Debtor, the Trustee, or any other party. This request includes not only the notices and papers referred to in the Rules above, but also includes, without limitation, Orders and notice of any Application, Motion, Petition, Pleading, Request, Complaint, and demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail delivery, telephone, telegraph, telex, facsimile or otherwise.

Respectfully submitted,

BY:/s/ Christopher A. DeNardo Christopher A. DeNardo 78447

LOGS Legal Group LLP 3600 Horizon Drive, Suite 150 King of Prussia, PA 19406

(610) 278-6800 logsecf@logs.com

LLG File #: 23-068663

Dated: July 14, 2023

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## **CERTIFICATE OF SERVICE**

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Entry of Appearance and Request for Notice by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this 14th day of July, 2023:

Higinio Mora 2412 S Carbon Street Allentown, PA 18103

David F. Dunn, Esquire 21 South 9th Street Allentown, PA 18102 dunncourtpapers@choiceonemail.com - VIA ECF

Scott Waterman, Trustee Chapter 13 Trustee 2901 St. Lawrence Avenue, Suite 100 Reading, PA 19606 ecfmail@reeadingch13.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Christopher A. DeNardo

Christopher A. DeNardo 78447 LOGS Legal Group LLP 3600 Horizon Drive, Suite 150 King of Prussia, PA 19406 (610) 278-6800 logsecf@logs.com